

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSE ANDREU,)	
)	
Plaintiff,)	
)	Case No. 07 C 06132
v.)	
)	Judge Der-Yeghiayan
UNITED PARCEL SERVICE, INC.,)	
)	
Defendant.)	

**DEFENDANT UNITED PARCEL SERVICE'S
MOTION TO AMEND MEMORANDUM OF LAW
IN SUPPORT OF MOTION FOR SUMMARY
JUDGMENT TO CORRECT CITATION**

Defendant United Parcel Service ("UPS") requests leave of this Court to file an Amended Memorandum of Law in Support of its Motion for Summary Judgment in order to correct a case citation and in support of this Motion states as follows:

1. On Monday, January 7, 2008, UPS filed its Motion for Summary Judgment in the above-captioned matter, including its Memorandum of Law in Support of the Motion.
2. On the evening of Tuesday, January 8, 2008, Plaintiff's counsel Timothy Coffey sent counsel for UPS an e-mail in which he stated he could not find a case cited in UPS's brief.
3. Upon review, counsel for UPS learned that it left the "S" off of "Shales" in Shales v. Meyer Material Company cited on page 14 of its Memorandum. Counsel then e-mailed a copy of the case to Mr. Coffey.
4. The proposed Amended Memorandum, a copy of which is attached, simply corrects the spelling of the case name and attaches a copy of the case to the Memorandum.
5. On Thursday, January 10, 2008, counsel for UPS sent Plaintiff's counsel Mr. Coffey a copy of this Motion and the proposed Amended Memorandum of Law for review. Mr.

Coffey indicated he had no objection to this Motion.

WHEREFORE, UPS moves this Court for leave to file the Amended Memorandum of Law in Support of Motion for Summary Judgment and for such other relief as this Court deems appropriate.

Dated: January 10, 2008

Respectfully submitted,

UNITED PARCEL SERVICE, INC.

By: /s/ D. Scott Watson

One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on January 10, 2008, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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*/s/ D. Scott Watson*_____